Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

A completed **Standard Inspection Checklist, OQ Field Validation Protocol form and Cover Letter/Field Report** are to be submitted to the Chief Engineer within **30 days** from completion of the inspection.

Inspection Report			
Docket Number	PG-110042		
Inspector Name & Submit Date	Dave Cullom December 20, 2011		
Chief Eng Name & Review/Date	Joe Subsits, December 28, 2011		
Operator Information			
Name of Operator:	Puget Sound Energy	**OP ID #:**	22189
Name of Unit(s):	Thurston/Lewis		
Records Location:	North Seattle (in lieu of Georgetown due to remodeling) Tacoma – Pressure control records Bellevue - Leak records		
Date(s) of Last (unit) Inspection:	April 7 – May 20, 2008	**Inspection Date(s):**	11/8/2011 – 12/2/2011

Inspection Summary:
This inspection included a records and field review of pipeline facilities. There were some issues noted in the leak survey program and the atmospheric corrosion monitoring program that was resolved internally by the operator before the inspection commenced. The field inspection did not have any issues. There were two probable violations noted for a casing that had been shorted for numerous years and did not have the proper follow-up action taken during that time period.

HQ Address:	**System/Unit Name & Address:**
PO Box 90868 M/S PSE-12N Bellevue, WA 98009-0868	Thurston Lewis PO Box 90868 M/S PSE-12N Bellevue, WA 98009-0868
Co. Official: Sue McLain **Phone No.:** (425) 462-3696 **Fax No.:** (425) 462-3770 **Emergency Phone No.:** (800) 552-7171	**Phone No.:** (425) 462-3207 **Fax No.:** (425) 462-3770 **Emergency Phone No.:** (800) 552-7171

Persons Interviewed	Title	Phone No.
Darryl Hong	Coordinator– Gas Compliance	425-766-3388
Cheryl McGrath	Manager – Gas Compliance	425-462-3207
Stephanie Silva	Consulting Engineer – Gas Standards	425-462-3923
Jim Chartrey	Pressure Control Supervisor South	253-476-6088
Jerry Games	Engineering Assistant	253-476-6224
John Hander	Supervisor – Gas First Response	253-476-6326
Dave Moffett	Corrosion Supervisor - South	253-476-6216
Brenda Wagner	Gas Engineer – Natural Gas Planner	425-462-3931

WUTC staff conducted an abbreviated procedures inspection on 192 O&M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.
(check one below and enter appropriate date)

☐	Team inspection was performed (Within the past five years.) or,	**Date:**	
☒	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	**Date:**	11/29/2010

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GAS SYSTEM OPERATIONS

Gas Supplier	Williams Northwest Pipeline

Services:
Residential ~150,000 ***Commercial*** ~1500 ***Industrial*** Same as commercial ***Other*** Unknown

Number of reportable safety related conditions last year 0	Number of deferred leaks in system Company-wide 2874
Number of non-reportable safety related conditions last year 0	Number of third party hits last year Company-wide 824
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas) 3.5 for the Olympia Supply	Miles of main within inspection unit(total miles and miles in class 3 & 4 areas) 1006 miles – no differentiation between 3 and 4

Operating Pressure(s):		MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:	Olympia	400 MAOP Olympia Supply	385
Town:	Toledo Gate Winlock Gate Chehalis Gate	Winlock MAOP 200 Chehalis 280 Toledo MAOP 60	140 270 55
Other:			

Does the operator have any transmission pipelines?	Yes
Compressor stations? Use Attachment 1.	No

Pipe Specifications:			
Year Installed (Range)	1952 - 2011	Pipe Diameters (Range)	½ - 16 inch
Material Type	PE and steel	Line Pipe Specification Used	API-5L and ASTM-D2513
Mileage	~5000	SMYS %	20.1

Operator Qualification Field Validation

Important: Per OPS, the OQ Field Inspection Protocol Form (Rev 3, Feb 08) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA OQ Database (OQDB) located at http://primis.phmsa.dot.gov/oqdb/home.oq **Date Completed** 12/29/2011

Integrity Management Field Validation

Important: Per PHMSA, IMP Field Verification Form (Rev 3, March 09) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA IM Database (IMDB) located at http://primis.phmsa.dot.gov/gasimp/home.gim **Date Completed:** 12/29/2011

PART 199 Drug and Alcohol Testing Regulations and Procedures		S	U	NA	NC
Subparts A - C	Drug & Alcohol Testing & Misuse Prevention Program – Use PHMSA Form #13, Rev 3/19/2010. Do not ask the company to have a drug and alcohol expert available for this portion of your inspection.	X			

REPORTING RECORDS			S	U	N/A	N/C
1.	**49 U.S.C. 60132, Subsection (b)**	**For Gas Transmission Pipelines and LNG Plants. Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002** Updates to NMPS: Operators are required to make update submissions every 12 months if any system modifications have occurred. If no modifications have occurred since the last complete submission (including operator contact in formation), send an email to opsgis@rspa.dot.gov stating that fact. Include operator contact information with all updates. ****Notes – Toni Imad provided an email from 02/22/2011 showing the submission occurred****	X			

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		REPORTING RECORDS	S	U	N/A	N/C
2.	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders? ****Notes - Yes per Rey Dejos 11/08/2011****	X			
3.	191.5	Immediate Notice of certain incidents to **NRC (800) 424-8802**, or electronically at http://www.nrc.uscg.mil/nrchp.html, and additional report if significant new information becomes available. Operator must have a written procedure for calculating an initial estimate of the amount of product released in an accident. ****Notes – If a release is over 3 mmcf they report it. It is in the response planning engineer guideline. They use a spreadsheet to do the actual calculations****	X			
4.	191.7	Reports (except SRCR and offshore pipeline condition reports) must be submitted electronically to PHMSA at https://opsweb.phmsa.dot.gov at unless an alternative reporting method is authorized IAW with paragraph (d) of this section.	X			
5.	191.15(a)	30-day follow-up written reports to PHMSA **(Form F7100.2)** Submittal must be electronically to http://pipelineonlinereporting.phmsa.dot.gov ****Notes - No incidents for this unit****			X	
6.	191.15(c)	Supplemental report (to 30-day follow-up) ****Notes - No incidents for this unit****			X	
7.	191.17	Complete and submit DOT Form PHMSA F 7100-2.1 by March 15 of each calendar year for the preceding year. *(NOTE: June 15, 2011 for the year 2010).*	X			
8.	191.22	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at https://opsweb.phmsa.dot.gov ****Notes - Not required until 2012. In the process of validating. Not due until June 2012****			X	
9.	191.23	Filing the **Safety Related Condition Report** (SRCR) ****Notes - None for this unit****			X	
10.	191.25	Filing the SRCR within 5 days of determination, but not later than 10 days after discovery ****Notes - None for this unit****			X	
11.	.605(d)	Instructions to enable operation and maintenance personnel to recognize potential **Safety Related Conditions 2425.1200**	X			
12.	191.27	Offshore pipeline condition reports – filed within 60 days after the inspections ****Notes - None****			X	
13.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports ****Notes - None****			X	
14.	480-93-200(1)	Telephonic Reports to **UTC Pipeline Safety Incident Notification 1-888-321-9146** (Within **2 hours**) for events which results in;				
15.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization; ****Notes - None for this unit****			X	
16.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; ****Notes - None for this unit****			**X**	
17.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas;	X			
18.	480-93-200(1)(d)	The unintentional ignition of gas;	X			
19.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers;	X			
20.	480-93-200(1)(f)	A pipeline pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020;	X			
21.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (f) of this subsection;	X			
22.	480-93-200(2)	Telephonic Reports to **UTC Pipeline Safety Incident Notification 1-888-321-9146** (Within **24 hours**) for;				
23.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours;	X			
24.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply gas pipeline out of service; ****Notes – None occurred****			X	

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		REPORTING RECORDS	S	U	N/A	N/C
25.	480-93-200(2)(c)	A gas pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or ****Notes – None occurred****			X	
26.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP	X			
27.	480-93-200(4)	Did written incident reports (within 30 days of telephonic notice) include the following				
28.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged;	X			
29.	480-93-200(4)(b)	The extent of injuries and damage;	X			
30.	480-93-200(4)(c)	A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report;	X			
31.	480-93-200(4)(d)	A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved;	X			
32.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;	X			
33.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site;	X			
34.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;	X			
35.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;	X			
36.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company;	X			
37.	480-93-200(4)(j)	Line type;	X			
38.	480-93-200(4)(k)	City and county of incident; and	X			
39.	480-93-200(4)(l)	Any other information deemed necessary by the commission.	X			
40.	480-93-200(5)	Supplemental report if required information becomes available after 30 day report submitted	X			
41.	480-93-200(6)	Written report within 5 days of receiving the **failure analysis** of any incident or hazardous condition due to **construction defects or material failure **Notes – They were missing 2008 and 2009, but they submitted in 2010****	X			
42.	480-93-200(7)	**Annual Reports** filed with the commission no later than **March 15** for the proceeding calendar year				
43.	480-93-200(7)(a)	A copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, PHMSA/Office of Pipeline Safety	X			
44.	480-93-200(7)(b)	Damage Prevention Statistics Report including the following;				
45.	480-93-200(7)(b)(i)	Number of gas-related one-call locate requests completed in the field;	X			
46.	480-93-200(7)(b)(ii)	Number of third-party damages incurred; and	X			
47.	480-93-200(7)(b)(iii)	Cause of damage, where cause of damage is classified as one of the following: (A) Inaccurate locate; (B) Failure to use reasonable care; (C) Excavated prior to a locate being conducted; or (D) Other.	X			
48.	480-93-200(7)(c)	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures.	X			
49.	480-93-200(8)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities	X			
50.	480-93-200(9)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	X			
51.	480-93-200(10)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	X			

Comments:

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CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
52.	192.16	**Customer notification** - Customers notified, within **90 days**, of their responsibility for those service lines not maintained by the operator ****Notes – It is a bill stuffer****	X			
53.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381?	X			
54.	192.383	Does the operator have an installation and reporting program for excess flow valves and does the program meet the requirements outlined in §192.383? Are records adequate? *****Yes, they are on D-4s*****	X			

Comments:

CONSTRUCTION RECORDS			S	U	N/A	N/C
55.	480-93-013	OQ records for personnel performing New Construction covered tasks ****Notes – Reviewed Mark Wiggins tasks (not currently qualified for welding) and Jim Allen (currently qualified for welding) - ****	X			
56.	192.225	Test Results to Qualify Welding Procedures	X			
57.	192.227	Welder Qualification	X			
58.	480-93-080(1)(b)	Appendix C Welders re-qualified **2/Yr (7.5Months)**	X			
59.	480-93-080(2)	Plastic pipe joiners re-qualified **1/Yr (15 Months) **Notes – the fitters in this unit performed numerous production joints within the year****			X	
60.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period ****Notes – Reviewed Mark Wiggins tasks (not currently qualified for welding) and Jim Allen (currently qualified for welding – Appendix C) - ****			X	
61.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners **1/Yr (12Months) **Notes – They track production joints****	X			
62.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 ****Notes – None that operator is aware of****	X			
63.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains ****Notes – No transmission projects and no job records selected of main installed with casings****			X	
64.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services ****Notes – The procedure states to seal the end nearest to the house, but the D-4 does not have an entry for the actual task of sealing the ends****	X			
65.	192.241(a)	Visual Weld Inspector Training/Experience ****Notes – QA&I inspectors perform this task – I checked Weld Inspection Review 11/11/2010 for Keith Miller and Kirk Schroeder 6/15/11. This is done every two years.**	X			
66.	192.243(b)(2)	Nondestructive Technician Qualification ****Notes – They use Acuren as a provider, and they have not performed any construction of pipelines over 40% SMYS per 192.241 b2****			X	
67.	192.243(c)	NDT procedures ****Notes – They do 100% of pipe tie-in larger than 6 inches, but they have not performed any construction of pipelines over 40% SMYS per 192.241b2****			X	

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CONSTRUCTION RECORDS			S	U	N/A	N/C
68.	192.243(f)	Total Number of Girth Welds ****Notes – They have not performed any construction of pipelines over 40% SMYS per 192.241b2, but we looked at DR-2708 for 2007 (Jackson Prairie)****			X	
69.	192.243(f)	Number of Welds Inspected by NDT ****Notes – They have not performed any construction of pipelines over 40% SMYS per 192.241b2, but we looked at DR-2708 for 2007 (Jackson Prairie)****			X	
70.	192.243(f)	Number of Welds Rejected ****Notes – They have not performed any construction of pipelines over 40% SMYS per 192.241b2, but we looked at DR-2708 for 2007 (Jackson Prairie)****			X	
71.	192.243(f)	Disposition of each Weld Rejected ****Notes – They have not performed any construction of pipelines over 40% SMYS per 192.241b2, but we looked at DR-2708 for 2007 (Jackson Prairie)****			X	
72.	.273/.283	Qualified Joining Procedures Including Test Results	X			
73.	192.303	Construction Specifications	X			
74.	192.325 WAC 480-93-178(4)(5)	Underground Clearances	X			
75.	192.327	Amount, location, cover of each size of pipe installed	X			
76.	480-93-160(1)	Report filed **45 days** prior to construction or replacement of transmission pipelines **≥ 100** feet in length ****Notes- No construction of this type during this inspection period****			X	
77.	480-93-160(2)	Did report describe the proposed route and the specifications for the pipeline and must include, but is not limited to the following items: ****Notes- No construction of this type during this inspection period****			X	
78.	480-93-160(2)(a)	Description and purpose of the proposed pipeline; ****Notes- No construction of this type during this inspection period****			X	
79.	480-93-160(2)(b)	Route map showing the type of construction to be used throughout the length of the line, and delineation of class location as defined in 49 CFR Part 192.5, and incorporated boundaries along the route. ****Notes- No construction of this type during this inspection period****			X	
80.	480-93-160(2)(c)	Location and specification of principal valves, regulators, and other auxiliary equipment to be installed as a part of the pipeline system to be constructed ****Notes- No construction of this type during this inspection period****			X	
81.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed; ****Notes- No construction of this type during this inspection period****			X	
82.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route. ****Notes- No construction of this type during this inspection period****			X	
83.	480-93-160(2)(f)	Proposed corrosion control program to be followed including specs for coating and wrapping, and method to ensure the integrity of the coating using holiday detection equipment; ****Notes- No construction of this type during this inspection period****			X	
84.	480-93-160(2)(g)	Welding specifications; and****Notes- No construction of this type during this inspection period****			X	
85.	480-93-160(2)(h)	Bending procedures to be followed if needed. ****Notes- No construction of this type during this inspection period****			X	
86.	480-93-170(1)	Commission notified 2 days prior to pressure testing pipelines with an MAOP producing a hoop stress **≥ 20% SMYS**? ****Notes- No construction of this type during this inspection period****			X	
87.	480-93-170(7)	Pressure tests records at a minimum include required information listed under 480-93-170(a-h) *****Notes – The D-4 for example order 106232448 (Form Rev. 11-12-2009) did not have time or test disposition as required under rule. PSE changed the form. It was revised in 3/10 DR-2708 had all of the required information.**	X			
88.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed? ****Notes – Looked at Hogum Bay project****	X			
89.	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule) ****Notes - digital pressure gauges 2450.1600** Infrasource, Heath Looked at 1st qtr 09 and 2nd qtr 09 pressure gauges for Pilchuck, ****	X			

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		CONSTRUCTION RECORDS	S	U	N/A	N/C
90.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines **> 60 psig** ***Notes – None during this inspection period **			X	
91.	480-93-175(4)	Leak survey within **30 days** of moving or lowering pipelines **≤ 60 psig** ***Notes – None during this inspection period **			X	

Comments:

		OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
92.	192.517(a)	Pressure Testing (operates at or above 100 psig) – **useful life of pipeline **Notes - We looked at DR-2708 as an example****	X			
93.	192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – **5 years **Notes – Looked at several D-4s****	X			
94.	192.605(a)	Procedural Manual Review – Operations and Maintenance (**1 per yr/15 months**) **Note:** Including review of OQ procedures as suggested by PHMSA - ADB-09-03 dated 2/7/09	X			
95.	192.605(b)(3)	Availability of construction records, maps, operating history to operating personnel	X			
96.	480-93-018(3)	Records, including maps and drawings updated within **6 months** of completion of construction activity?	X			
97.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures ** **Notes - QA&I ****	X			
98.	192.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures **Notes –We looked at the 16 inch damage for different unit as an example**	X			
99.	192.609	Class Location Study (**If applicable**) **Notes – The operator designs new construction to class 4. No pipelines in this unit operate over 40% SMYS**			X	
100.	192.611	Confirmation or revision of MAOP **Notes - Salishan and other proximity requests were used**	X			
101.	192.614	**Damage Prevention (Operator Internal Performance Measures)**				
102.		Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required) **Notes – The quality assurance and inspection team performs monthly audits and they meet monthly and go over the reports. They audit for response time. If the locate was late, was there agreement.**	X			
103.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? **Notes – They have performance metrics that are reporting monthly. They have up to probation and/or penalties can be assessed. The contractors also have a quality control program. There is a PSE quality assurance plan and a checklist.**	X			
104.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels? **Notes – They use an "AF" at-fault monthly report from CLS (USIC) to track performance problems. They also get a daily report of mostly ongoing locates.**	X			

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105.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? ****Notes – They review the contractors OQ plan criteria annually.****	X			
106.		Review operator locating and excavation procedures for compliance with state law and regulations. ****Notes – Checked 2425.1600****	X			
107.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample. ****Notes – Yes reviewed ticket tracking report for 7-18 week of 2009 and 2010****	X			
108.		Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements? ****Notes – PSE reviews the contractors OQ credentials.****	X			
109.		Follow-up inspection performed on the pipeline where there is reason to believe the pipeline could be damaged .614(c) (6) 1. Is the inspection done as frequently as necessary during and after the activities to verify the integrity of the pipeline? 2. In the case of blasting, does the inspection include leakage surveys? ****Notes – O& M 2425.1600 Section 5 has the distribution requirements per Stephanie Silva. Stephanie stated Section 7 covers the construction of transmission lines and mains while section 5 covers 614c. 2575.1900 is the failure procedure. Every exposed pipe is logged on the EPCR. In Thurston there is a special leak survey for 2008 and 2009 for Littlerock Rd. ****	X			
110.		**Informational purposes only. Not Required.** Does the pipeline operator voluntarily submit pipeline damage statistics into the UTC Damage Information Reporting Tool (DIRT)? Operator may register at https://identity.damagereporting.org/cgareg/control/login.do **Y** **N** X	X			

Comments:

111.		Emergency Response Plans	S	U	N/A	N/C
112.	192.603(b)	Prompt and effective response to each type of emergency .615(a)(3) **Note:** Review operator records of previous accidents and failures including third-party damage and leak response -	X			
113.	192.615(b)(1)	Location Specific Emergency Plan	X			
114.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training ****Notes – Emergency Procedure Training – Looked at assessment and scoring for Jake Elhi****	X			
115.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed. ****Notes – Reviewed QA&I gas site audit to check that procedures were being followed. Looked at 2009 main replacement, but was not an emergency. Also looked at the review of the 16 inch repair on 3605 E Marginal Way that Lex Vinsel was on site for.****	X			

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<table>
<tr><td>116.</td><td>192.615(c)</td><td>Liaison Program with Public Officials **Notes – I attended training where public officials were invited to take part in ERT training. There is also online training for the FR's as well.**</td><td>X</td><td></td><td></td><td></td></tr>
<tr><td>117.</td><td>192.616</td><td>Public Awareness Program</td><td></td><td></td><td></td><td></td></tr>
<tr><td>118.</td><td>192.616(e&f)</td><td>Documentation properly and adequately reflects implementation of operator's Public Awareness Program requirements - Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc.). See table below:</td><td>X</td><td></td><td></td><td></td></tr>
<tr><td>119.</td><td></td><td>Operators in existence on June 20, 2005, must have completed their written programs no later than June 20, 2006. See 192.616(a) and (j) for exceptions. **Notes - They completed their program in 2006. **</td><td></td><td></td><td></td><td></td></tr>
<tr><td>120.</td><td></td><td>API RP 1162 Baseline* Recommended Message Deliveries</td><td></td><td></td><td></td><td></td></tr>
<tr><td>121.</td><td></td><td>
<table>
<tr><th>Stakeholder Audience (LDC's)</th><th>Baseline Message Frequency (starting from effective date of Plan)</th></tr>
<tr><td>Residence Along Local Distribution System</td><td>Annual – **Notes – Monthly they use a bill stuffer</td></tr>
<tr><td>LDC Customers</td><td>Twice annually - **Notes – They use monthly**</td></tr>
<tr><td>One-Call Centers</td><td>As required of One-Call Center **Notes - They have a representative that sits on the board**</td></tr>
<tr><td>Emergency Officials</td><td>Annual - ** Notes They do 8 presentations a year and reach about 900 individuals They have a emergency management road show and talk about storm season prep for electric and gas. They also reach volunteer fire departments in the evenings**</td></tr>
<tr><td>Public Officials</td><td>3 years - ** Notes They have franchise agreements and they discuss during renewal. They attend the APWA meetings and they host meetings in house as well.**</td></tr>
<tr><td>Excavator and Contractors</td><td>Annual ** Notes They had a list from August 2010. They send repeat offenders notices and they are working to better reach them**</td></tr>
<tr><th>Stakeholder Audience (Transmission line operators)</th><th>Baseline Message Frequency (starting from effective date of Plan)</th></tr>
<tr><td>Residence Along Local Distribution System</td><td>2 years – A 1 yr proximity notice – They use Pharohs.</td></tr>
<tr><td>One-Call Centers</td><td>As required of One-Call Center</td></tr>
<tr><td>Emergency Officials</td><td>Annual</td></tr>
<tr><td>Public Officials</td><td>3 years **They exceed the requirement**</td></tr>
<tr><td>Excavator and Contractors</td><td>Annual</td></tr>
</table>
</td><td></td><td></td><td></td><td></td></tr>
<tr><td>122.</td><td></td><td>* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.</td><td></td><td></td><td></td><td></td></tr>
<tr><td>123.</td><td>192.616(g)</td><td>The program conducted in English and any other languages commonly understood by a significant number of the population in the operator's area.</td><td>X</td><td></td><td></td><td></td></tr>
</table>

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124.	.616(h)	IAW API RP 1162, the operator's program should be reviewed for effectiveness within four years of the date the operator's program was first completed. For operators in existence on June 20, 2005, who must have completed their written programs no later than June 20, 2006, the first evaluation is due no later than **June 20, 2010**. .616(h) ****Notes – They have Aegis, Paul Oleksa, and insurance audits. They have been through several iterations of review. They used the Gilmore company to do a telephonic study. The 2010 evaluation was completed early.****	X			
125.	192.616(j)	Operators of a Master Meter or petroleum gas system – public awareness messages 2 times annually: (1) A description of the purpose and reliability of the pipeline; (2) An overview of the hazards of the pipeline and prevention measures used; (3) Information about damage prevention; (4) How to recognize and respond to a leak; and (5) How to get additional information.	X			
126.	192.617	Review operator records of accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 **Note:** Including excavation damage and leak response records (PHMSA area of emphasis) (NTSB B.10) ****Notes – The operator sends repeat offenders letters.****	X			

Comments:

127.	192.619/621/623	Maximum Allowable Operating Pressure (**MAOP**) Note: New PA-11 design criteria is incorporated into 192.121 & .123 (Final Rule Pub. 12/24/08)	X			
128.	480-93-015(1)	Odorization of Gas – Concentrations adequate ****Notes – Looked at all test stations for the last three years. They are using about three instruments. Nothing higher than a .4 that I saw****	X			
129.	480-93-015(2)	Monthly Odorant Sniff Testing	X			
130.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements ****Note – No low reads – I checked all of them for three years****			X	
131.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation)	X			
132.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? **1/yr(15 months) **Notes - 4x per year** Darryl to provide WO records**	X			
133.	480-93-124(4)	Markers reported missing or damaged replaced within **45 days? **Notes – None noted during the pre-field inspection****			X	
134.	480-93-140(2)	Service regulators and associated safety devices tested during initial turn-on ****Notes – looked meter information tags****	X			
135.	480-93-155(1)	Up-rating of system MAOP to **> 60 psig**? Procedures and specifications submitted **45 days** prior?	X			
136.	480-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained? *****Notes – waiting on response times like Kittitas CLX336977487 1173min – Responded and fixed in 1.5 hours CLX335160653 984min - Completed within 2 hrs per leak investigation*** **Darryl indicated that there was a computer outage, and timesheets indicate the response time was an hour and a half. *****	X			
137.	480-93-185(3)(a)	Leaks originating from a foreign source. Take appropriate action to protect life and property regarding the pipeline company's own facilities, and;	X			

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138.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? ****Notes – Looked at numerous investigation tickets . Odor response letter db entries looked at as well****	X			
139.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within **30 days** of a leak repair?	X			
140.	480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair? ****Notes – Looked at Numerous leak survey records****	X			
141.	480-93-187	Gas leak records: at a minimum include required information listed under 480-93-187(1-13) ****Notes - Grade C's from LMS did not have because they had a simple formatted record. No bar hole sketch or tickets for many records.** **N0024416** **N0032796** **N0025334** **N0029177** **N0032121** **N0031901** **N0027179** **N0024337** **N0024416 and others missing essential information.** **This has been addressed in 2010 on page 3 of the Heath Leak Record Audit Report, but will note as a P/V handled internally by PSE well before the audit.****	X			
142.	480-93-188(1)	Gas leak surveys	X			
143.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days) ****Notes - We looked at G/S records for the entire unit 2009 and 2010 for Pilchuck The operator noted that the gas scopes had a calibration problem by PSE that Scott Rukke found the gas detection units were not done each calendar year. The follow-up could not find any evidence of that ****	X			
144.	480-93-188(3)	Leak survey frequency **(Refer to Table Below)**	X			

Business Districts **(implement by 6/02/07)**	**1/yr (15 months)**
High Occupancy Structures	**1/yr (15 months)**
Pipelines Operating ≥ 250 psig	**1/yr (15 months)**
Other Mains: CI, WI, copper, unprotected steel	**2/yr (7.5 months)**

145.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs *****Notes - Yelm Highway project P/I Inspector – None per Gary Swanson Rich Eberly was out there.****	X			
146.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred *****Notes - Littlerock project****	X			
147.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected *****Note - None *****			X	
148.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions *****Note - None *****			X	
149.	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage to services, operators must perform a gas leak survey from the point of damage to the service tie-in.	X			
150.	480-93-188(5)	Gas Survey Records **(Min 5 yrs)** and at a minimum include required information listed under 480-93-188 (5) (a-f)****Notes - The new form has all the information this was identified The pre 2010 leak work orders maps records do not exist they are only in LMS as a check. See question 141****	X			
151.	480-93-188(6)	Leak program - Self Audits ****Notes – Every three years – it is an audit of the leak survey program (Heath, Gas Operations). Also QA&I does audits of Heath. One was done in 2010 and the one previous to that was not implemented as whole.****	X			
152.	192.709	Patrolling (Transmission Lines) **(Refer to Table Below)** .705 ****Notes – We looked at 2010 Olympia Supply****	X			

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Class Location	At Highway and Railroad Crossings	At All Other Places
1 and 2	2/yr (7½ months)	1/yr (15 months)
3	4/yr (4½ months)	2/yr (7½ months)
4	4/yr (4½ months)	4/yr (4½ months)

153.	192.709	Leak Surveys (Transmission Lines) (**Refer to Table Below**) .706	X			

Class Location	Required	Not Exceed
1 and 2	1/yr	15 months
3	2/yr	7½ months
4	4/yr	4½ months

154.	192.603(b)	Patrolling Business District (**4 per yr/4½ months**) .721(b)(1)	X			
155.	192.603(b)	Patrolling Outside Business District (**2 per yr/7½ months**) 192.721(b)(2)	X			
156.	192.603(b)	Leakage Survey - Outside Business District (**5 years**) 192 .723(b)(1) ****Notes – 3yrs is how often it is conducted . ****	X			
157.	192.603(b)	Leakage Survey 192.723(b)(2) • Outside Business District (**5 years**) ****Notes – 3yrs is how often it is conducted. **** • Cathodically unprotected distribution lines (**3 years**) ****Notes – None only bare steel****	X			
158.	192.603(b)	Tests for Reinstating Service Lines 192.725	X			
159.	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727 ****Notes – None****			X	
160.	192.709	Pressure Limiting and Regulating Stations (**1 per yr/15 months**) .739 ****Notes – Checked my list see word doc for record detail****	X			
161.	192.709	Pressure Limiting and Regulator Stations – Capacity (**1 per yr/15 months**) .743 **Notes there is a gap – before 2010 because they were overwriting the previous years records. This has been fixed. They were able to show that a review had been done if no parameters had changed. ****Notes - OS 2575-1000 states in 7.2 they will do a review every year ****	X			
162.	192.709	Valve Maintenance – Transmission (**1 per yr/15 months**) .745	X			
163.	192.709	Valve Maintenance – Distribution (**1 per yr/15 months**) .747 ****Notes - Looked at ~all station valves and section valves – looked at 2009, 2010, and 2011****	X			
164.	480-93-100(3)	Service valve maintenance (**1 per yr/15 months**)****Notes - HOS valves from Darryl in file****	X			
165.	192.709	Vault maintenance (**≥200 cubic feet**)(**1 per yr/15 months**) .749 ****Notes – None****			X	
166.	192. 603(b)	Prevention of Accidental Ignition (hot work permits) .751 ****Notes – Have procedures, but no instances of hot work permits****	X			
167.	192. 603(b)	Welding – Procedure 192.225(b)	X			
168.	192. 603(b)	Welding – Welder Qualification 192.227/.229	X			
169.	192. 603(b)	NDT – NDT Personnel Qualification .243(b)(2) ****Notes – They use Acuren as a provider****	X			
170.	192.709	NDT Records (**pipeline life**) .243(f)	X			
171.	192.709	Repair: pipe (**pipeline life**); Other than pipe (**5 years**)	X			
172.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's)	X			

Comments:

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
173.	192.455(a)(1)	Pipeline coatings meet requirements of 192.461 *(for buried pipelines installed after 7/31/71)*	X			
174.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction *(after 7/31/71)*	X			
175.	192.465(a)	Annual Pipe-to-soil Monitoring (**1 per yr/15 months**) for short sections (**10% per year; all in 10 years**)	X			
176.	192.491	Test Lead Maintenance .471	X			
177.	192.491	Maps or Records .491(a) ** **Notes - viewed online maps of CP system – looked good** **	X			
178.	192.491	Examination of Buried Pipe when exposed .459	X			
179.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed *** **Notes- Darryl gave on disk the EPCRs** ***	X			
180.	192.491	Annual Pipe-to-soil monitoring (**1 per yr/15 months**) .465(a) *** **Notes - Darryl gave on disk – checked ~5k records spot checked** **	X			
181.	192.491	Rectifier Monitoring (**6 per yr/2½ months**) .465(b) *** **Notes - Darryl gave on disk – checked to ~4/2008** **	X			
182.	192.491	Interference Bond Monitoring – Critical (**6 per yr/2½ months**) .465(c) ** **Notes – None per Dave Moffett** **			X	
183.	192.491	Interference Bond Monitoring – Non-critical (**1 per yr/15 months**) .465(c)) ** **Notes – None per Dave Moffett** **			X	
184.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d)				
185.	480-93-110(3)	CP equipment/ instrumentation maintained, tested for accuracy, calibrated, and operated in accordance with manufactures recommendations, or at appropriate schedule determined by gas company if no recommendation.	X			
186.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas (**1 per 3 cal yr/39 months**) .465(e) ***Note - **They have some active corrosion areas Brenda explained protected and unprotected.***	X			
187.	192.491	Electrical Isolation (**Including Casings**) .467 *** **Notes - Darryl gave on disk Capitol and Legion **Noted one casing that was shorted****	X			
188.	480-93-110(5)	Casings inspected/tested annually not to exceed **fifteen months** ***Note - **Darryl gave on disk****	X			
189.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods **Notes – **No casings without test leads installed prior to 1992 in unit per DH****			X	
190.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within **90 days ***Notes – No follow-up done witihin 90 days. It has been shorted since 2008 and the operator indicated the records went back to 2006 and those readings also showed readings below the 100mV isolation criteria.****		X		
191.	480-93-110(5)(c)	Casing shorts cleared when practical **Notes – **Shorted ones have been cleared per operator. Double checked records. I found a shorted casing record at Capitol and Legion. The casing is shorted and were sent into Gary to schedule a leak survey per the AC code twice a year per Darryl on 11/28.****	X			
192.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. **Twice annually/7.5 months***Notes - No survey done within 90 days. No leak survey 2x per year NTE 7.5 months between surveys thereafter***		X		
193.	192.491	Interference Currents .473 **Notes – **None known****			X	

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
194.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a) *****Notes – EPCRs have an IC entry – did not see any indication of IC on the EPCRs I reviewed *****			X	
195.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b)****Notes – Darryl will ask Alan Mulkey about it. He asked and there was none per Alan.****	X			
196.	192.491	Internal Corrosion Control Coupon Monitoring (**2 per yr/7½ months**) .477)****Notes – None except JP which is interstate ****			X	
197.	192.491	Atmospheric Corrosion Control Monitoring (**1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore**) .481 Meters 629581 1071446 369101 Meterless riser next to 1074794 739 Nevil Rd 894659 335873 946328 874522 ****Notes – They did not have individual records for these services to demonstrate that monitoring had been performed within the required timeframe. The explanation given was that the 1's and 2's were not explicitly recorded by Heath Consultants and they were conducted as part of a geographic/map based survey (like highlighting the mains and services checked for a leak survey). In the leak survey individual services are not tracked, but the area is looked at as a whole and the exceptions are noted. Patti Johnson during her audit noted the O&M manual was not updated to reflect this method of documenting atmospheric corrosion control monitoring and she will note in her findings.****	X			
198.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485	X			

Comments:

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
199.	192.161	Supports and anchors	X			
200.	480-93-080(1)(d)	Welding procedures located on site where welding is performed? ****Notes - No work of this type being performed for this unit during the field portion ****			X	
201.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables ****Notes - No work of this type being performed for this unit during the field portion ****			X	
202.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed? ****Notes - No work of this type being performed for this unit during the field portion ****			X	
203.	480-93-080(3)	Identification and qualification cards/certificates w/name of welder/joiner, their qualifications, date of qualification and operator whose qualification procedures were followed. ****Notes - No work of this type being performed for this unit during the field portion ****			X	
204.	480-93-013	Personnel performing "New Construction" covered tasks OQ qualified? ****Notes - No work of this type being performed for this unit during the field portion ****			X	
205.	480-93-015(1)	Odorization ****Notes – We took a readings at 3rd and Alder and the Great Wolf Lodge (Claim Jumper Burgers) and they were satisfactory. Additional detail is in**	X			

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
		the field data collection form**				
206.	480-93-018(3)	Updated records, inc maps and drawings made available to appropriate operations personnel?	X			
207.	192.179	Valve Protection from Tampering or Damage	X			
208.	192.455	Pipeline coatings meet requirements of 192.461 *(for buried pipelines installed after 7/31/71)*	X			
209.	192.463	Levels of cathodic protection	X			
210.	192.465	Rectifiers	X			
211.	192.467	CP - Electrical Isolation	X			
212.	192.476	Systems designed to reduce internal corrosion	X			
213.	192.479	Pipeline Components exposed to the atmosphere	X			
214.	192.481	Atmospheric Corrosion: monitoring	X			
215.	192.491	Test Stations – Sufficient Number .469	X			
216.	480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992)	X			
217.	480-93-115(2)	Mains or transmission lines installed in casings/conduit. Are casing ends sealed?	X			
218.	480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed?	X			
219.	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted	X			
220.	192.605	Knowledge of Operating Personnel	X			
221.	480-93-124	Pipeline markers	X			
222.	480-93-124(4)	Markers reported missing or damaged replaced within **45 days?**	X			
223.	192.719	Pre-pressure Tested Pipe (**Markings and Inventory**) ****Notes – No pretested or staged pipe was at the Lakewood base.** **			X	
224.	192.195	Overpressure protection designed and installed where required?	X			
225.	192.739/743	Pressure Limiting and Regulating Devices (**Mechanical/Capacities**)	X			
226.	192.741	Telemetering, Recording Gauges	X			
227.	192.751	Warning Signs	X			
228.	192.355	Customer meters and regulators. Protection from damage	X			
229.	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated.	X			
230.	480-93-140	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices?	X			
231.	480-93-178(2)	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs) ****Notes – Checked all spools of PE pipe at Lakewood field base**-**	X			
232.	480-93-178(4)	Minimum Clearances from other utilities. For parallel lines a minimum of twelve inches. Where a minimum twelve inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards.	X			
233.	480-93-178(5)	Minimum Clearances from other utilities. For perpendicular lines a minimum of six inches of separation from the other utilities. Where a minimum six inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards	X			
234.	480-93-178(6)	Are there Temporary above ground PE pipe installations currently? **Yes** **No** X				
235.	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage? ****Notes – No Installations****			X	
236.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline? ****Notes – No Installations****			X	
237.	192.745	Valve Maintenance (Transmission)	X			
238.	192.747	Valve Maintenance (Distribution)	X			

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
Facility Sites Visited:						
Facility Type	**Facility ID Number**	**Location**				
On optional field data collection form	On optional field data collection form	On optional field data collection form				

Comments:

Recent Gas Pipeline Safety Advisory Bulletins: (Last 2 years)

Number	Date	Subject
ADB-09-01	May 21, 2009	Potential Low and Variable Yield and Tensile Strength and Chemical Composition Properties in High Strength Line Pipe
ADB-09-02	Sept 30, 2009	Weldable Compression Coupling Installation
ADB-09-03	Dec 7, 2009	Operator Qualification Program Modifications
ADB-09-04	Jan 14, 2010	Reporting Drug and Alcohol Test Results for Contractors and Multiple Operator Identification Numbers
ADB-10-02	Feb 3, 2010	Implementation of Revised Incident/Accident Report Forms for Distribution Systems, Gas Transmission and Gathering Systems, and Hazardous Liquid Systems
ADB-10-03	March 24, 2010	Girth Weld Quality Issues Due to Improper Transitioning, Misalignment, and Welding Practices of Large Diameter Line Pipe

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ADB-10-04	April 29, 2010	Pipeline Safety: Implementation of Electronic Filing for Recently Revised Incident/Accident Report Forms for Distribution Systems, Gas Transmission and Gathering Systems, and Hazardous Liquid Systems
ADB-10-05	June 28, 2010	Pipeline Safety: Updating Facility Response Plans in Light of Deepwater Horizon Oil Spill
ADB-10-06	August 3, 2010	Pipeline Safety: Personal Electronic Device Related Distractions
ADB-10-07	August 31, 2010	Liquefied Natural Gas Facilities: Obtaining Approval of Alternative Vapor-Gas Dispersion Models
ADB-10-08	November 3, 2010	Pipeline Safety: Emergency Preparedness Communications
ADB-11-01	January 4, 2011	Pipeline Safety: Establishing Maximum Allowable Operating Pressure or Maximum Operating Pressure Using Record Evidence, and Integrity Management Risk Identification, Assessment, Prevention, and Mitigation
ADB-11-02	February 9, 2011	Dangers of Abnormal Snow and Ice Build-up on Gas Distribution Systems

For more PHMSA Advisory Bulletins, go to http://phmsa.dot.gov/pipeline/regs/advisory-bulletin

Attachment 1
Distribution Operator Compressor Station Inspection

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		COMPRESSOR STATION PROCEDURES	S	U	N/A	N/C
239.	.605(b)					
240.		.605(b)(6) Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service			X	
241.		.605(b)(7) Starting, operating, and shutdown procedures for gas compressor units			X	
242.		.731 Inspection and testing procedures for remote control shutdowns and pressure relieving devices (**1 per yr/15 months**), prompt repair or replacement			X	
243.		.735 (a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings			X	
244.		(b) Tank must be protected according to **NFPA #30**			X	
245.		.736 Compressor buildings in a compressor station must have fixed gas detection and alarm systems (**must be performance tested**), unless:			X	
246.		• **50% of the upright side areas** are permanently open, or			X	
247.		• It is an unattended field compressor station of **1000 hp or less**			X	

Comments:
No compressor stations

			COMPRESSOR STATION O&M PERFORMANCE AND RECORDS	S	U	N/A	N/C
248.	.709	.731(a)	Compressor Station Relief Devices (**1 per yr/15 months**)			X	
249.		.731(c)	Compressor Station Emergency Shutdown (**1 per yr/15 months**)			X	
250.		.736(c)	Compressor Stations – Detection and Alarms (**Performance Test**)			X	

Comments:
No compressor stations

			COMPRESSOR STATIONS INSPECTION (Field) (Note: Facilities may be "Grandfathered")	S	U	N/A	N/C
251.	.163	(c)	Main operating floor must have (at least) two (2) separate and unobstructed exits			X	
252.			Door latch must open from inside without a key			X	
253.			Doors must swing outward			X	
254.		(d)	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit			X	
255.			Each gate located within 200 ft of any compressor plant building must open outward			X	
256.			When occupied, the door must be opened from the inside without a key			X	
257.		(e)	Does the equipment and wiring within compressor stations conform to the **National Electric Code, ANSI/NFPA 70?**			X	
258.	.165	(a)	If applicable, are there liquid separator(s) on the intake to the compressors?			X	
259.		(b)	Do the liquid separators have a manual means of removing liquids?			X	
260.			If slugs of liquid could be carried into the compressors, are there automatic dumps on the separators, Automatic compressor shutdown devices, or high liquid level alarms?			X	
261.	.167	(a)	ESD system must:				

Attachment 1
Distribution Operator Compressor Station Inspection

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

			COMPRESSOR STATIONS INSPECTION (Field) (Note: Facilities may be "Grandfathered")	S	U	N/A	N/C
262.			- Discharge blowdown gas to a safe location			X	
263.			- Block and blow down the gas in the station			X	
264.			- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers			X	
265.			- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage			X	
266.			ESD system must be operable from at least two locations, each of which is:				
267.	.167		- Outside the gas area of the station			X	
268.			- Not more than 500 feet from the limits of the station			X	
269.			- ESD switches near emergency exits?			X	
270.		(b)	For stations supplying gas directly to distribution systems, is the ESD system configured so that the LDC will not be shut down if the ESD is activated?			X	
271.		(c)	Are ESDs on platforms designed to actuate automatically by…				
272.			- For unattended compressor stations, when:				
273.			▪ The gas pressure equals MAOP plus 15%?			X	
274.			▪ An uncontrolled fire occurs on the platform?			X	
275.			- For compressor station in a building, when				
276.			▪ An uncontrolled fire occurs in the building?			X	
277.			▪ Gas in air reaches 50% or more of LEL in a building with a source of ignition (facility conforming to **NEC Class 1, Group D** is not a source of ignition)?			X	
278.	.171	(a)	Does the compressor station have adequate fire protection facilities? If fire pumps are used, they must not be affected by the ESD system.			X	
279.		(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?			X	
280.		(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?			X	
281.		(d)	Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?			X	
282.		(e)	Are the mufflers equipped with vents to vent any trapped gas?			X	
283.	.173		Is each compressor station building adequately ventilated?			X	
284.	.457		Is all buried piping cathodically protected?			X	
285.	.481		Atmospheric corrosion of aboveground facilities			X	
286.	.603		Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?			X	
287.			Are facility maps current/up-to-date?			X	
288.	.615		Emergency Plan for the station on site?			X	
289.	.619		Review pressure recording charts and/or SCADA			X	
290.	.707		Markers			X	
291.	.731		Overpressure protection – relief's or shutdowns			X	
292.	.735		Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?			X	
293.			Is aboveground oil or gasoline storage tanks protected in accordance with **NFPA standard No. 30?**			X	
294.	.736		Gas detection – location			X	

Comments:

Attachment 1
Distribution Operator Compressor Station Inspection

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If an item is marked U, N/A, or N/C, an explanation must be included in this report.

Comments:
No compressor stations